Declaration of Robert R. Brischetto

Racial Bloc Voting in Selected Areas of Texas: 2014 - 2016

I.   Assignment and Qualifications

1.   My name is Robert Brischetto and I am a resident of Lakehills, Texas. I have been asked by attorneys for the Mexican American Legislative Caucus to analyze the extent of racial bloc voting in selected areas of Texas during the past two elections for the case at hand. In the 2014 trial of this case I testified about racial bloc voting in seven Texas counties in 2012. This report adds to and updates my findings of the report in my earlier testimony in the case of Perez v. State of Texas.

2.   The task I have been assigned in this report is to interpret the analyses conducted for the Mexican American Legal Defense and Education Fund (MALDEF) of Texas election contests in 2014 and 2016 in Congressional District 23 and in Nueces, Dallas, Tarrant, Harris, Bexar and 52 South Texas counties. I was asked to compare the findings of these analyses to those of the seven counties that I analyzed in the 2012 Texas elections and draw conclusions about the nature and extent of racially polarized voting.

3.   I am a consultant in social research and evaluation. I have a B.A. in English from St. Mary's University and an M.A. and Ph.D. in Sociology from the University of Texas at Austin. For the first twelve years of my career, I was a university professor, teaching courses in sociology, research methods, and statistics. For the next twelve years I conducted and directed research full-time in Hispanic voting and opinions. I was the founding executive director of the Southwest Voter Research Institute in San Antonio with a focus on Latinos in the five southwestern states. In 1995 I began my own research consulting firm, Social Research Services, and continued to conduct research in Mexican-American communities.

4.   My work on Latino voting and opinions has led me to conduct research as an expert in

vote dilution and redistricting challenges, evaluating voting patterns and factors necessary to

prove a Sec. 2 law suit or to draw redistricting plans. The first case was a DOJ objection in 1975

to annexations in San Antonio. I was asked to analyze elections to the San Antonio City Council

to ascertain whether voting was polarized along racial and ethnic lines.[1] I continued to do

research as an expert in more than 40 minority vote dilution suits in Texas, California, New

Mexico, Arizona, Colorado and South Dakota. I planned and executed phone, in-person and exit

surveys of Latinos and other ethnic groups. I have authored 66 publications on voting,

educational equity and racial/ethnic groups, edited 20 publications and presented 35 papers at

professional meetings on minority equity issues listed in my Resume, attached as Appendix A.[2]

5.   As executive director of the Southwest Voter Research Institute, I helped the U.S. Census

Bureau develop the first Census Information Center for minority non-profits using census data

after the 1990 Census. We received, managed, and analyzed the same data that the U.S. Census

Bureau would send to the Texas State Data Center.

II.   Methods

Operational Definition of Racially Polarized Voting

6.   My previous report to this Court discussed the definition of racially polarized voting.[3]

The definition of racially polarized voting adopted in federal case law stems from the case of

Gingles v. Edmisten 590 F.Supp.345, 367-78 (EDNC 1984) and the Supreme Court's decision in

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1 For publication of the results of that analysis, see: Robert Brischetto, Charles Cotrell and R. Michael Stevens, "Conflict and Change in the Political Culture of San Antonio in the 1970's," in John A. Booth, et al., eds., *The Politics of San Antonio: Community, Progress and Power.* (Lincoln: The University of Nebraska Press: 1982), Chapter 4.

2 I have not listed the opinion pieces that were published by local newspapers.

3 "Declaration of Dr. Robert R. Brischetto: Racial Bloc Voting in Seven Texas Counties in 2012," MALC Exhibit 161, July 14, 2014.

that case on appeal in *Thornburg v. Gingles*, 106 S.Ct. 2752, 2767-73. As stated by Justice

William Brennan, who delivered the opinion of the Court in Thornburg, a key element of the

minority plaintiffs' proof was "to ascertain whether minority group members constitute a

politically cohesive unit and to determine whether whites vote sufficiently as a bloc usually to

defeat the minority's preferred candidates."[4] Justice Brennan codified the definition of racially

polarized voting as set forth by plaintiffs' expert Bernard Grofman as "a consistent relationship

between race of the voter and the way in which the voter votes, or to but it differently, where

black voters and white voters vote differently."[5] The High Court accepted the testimony of Dr.

Grofman in *Gingles* that racial polarization exists where the data "reflected positive

relationships and that the correlations did not happen by chance."[6]

7.   Thus, the definition of racially polarized voting has two parts. The first is whether a racial

(or language) minority votes differently from the white majority. In other words, if an election

were held exclusively within each racial/ethnic group, the outcome would be different for the

different groups.

8.   The second part of the definition examines the support for a candidate among each

racial/ethnic group and asked whether the groups differ in a statistically significant manner. In

other words, how confident are we in our conclusion that the racial or ethnic groups are voting

differently?

9.   In *Thornburg* "the minority preferred candidate" is defined as the candidate who received

either the majority or plurality support from the minority group voters, regardless of the

candidate's race. Justice Brennan, not expressing a majority opinion of the Court, proffered that

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4 *Thornburg v. Gingles*, 478 U.S. 30 at 56, 50(1986). Heard in the lower court sub nom *Gingles v. Edmisten*, 590 F. Supp. 345 (1984), aff'd in part rev in part sub nom, *Thornburg v. Gingles*.

5 *Thornburg v. Gingles*, 478 U.S. at 53, note 21.

6 478 U.S. at 53, note 22.

"under Section 2, it is the status of the candidate as the chosen representative of a particular racial group, not the race of the candidate that is important."

10. In my analysis for this case, I look only at contests involving minority candidates. That is not to say that contests not involving minority candidates would not be probative of the existence of racially polarized voting. The identification of the "minority preferred candidate" is an empirical question that can be answered by looking at the results of the analysis.

11. In his testimony *in Gingles v. Edmisten*, Dr. Grofman proposed a definition of substantively significant racially polarized voting as "when the candidate or set of candidates chosen by voters of one race differs from the candidate or candidates chosen by voters of the other race."[7]

12. How much of a difference in voting patterns would constitute legally significant voter polarization has been argued in the courts for more than three decades. I am of the opinion that there are different degrees of polarization and that the pattern of voting across a number of contests is important to discern in deciding whether there is legally significant racially polarized voting.

13. We are investigating the voting behavior of different racial and ethnic groups to determine whether and to what extent each of these groups votes as a bloc and vote differently from one another. The question is important when evaluating a redistricting plan since the extent of racial bloc voting will determine whether districts can be drawn that allow minority voters to elect candidates of their choice.

14. Ideally, we would know how people vote by asking individuals to reveal their choices. Exit surveys of voters in person on Election Day provide that information, but these are not

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7 Grofman, "Expert Witness Testimony and the Evolution of Voting Rights Case Law," 209-210.

always conducted in the areas we are interested in, when we need them and on the scale necessary. Furthermore, there is some research to suggest that voters do not always tell the truth when asked about how they voted in contests involving racially different candidates. Since surveys of voters are not usually available on local political subdivisions in the elections of interest in a voting rights law suit, the question of whether there is racially polarized voting often must be answered with post-hoc election returns by precinct. These basic areal units require ecological inferences about individual behavior.

Ecological Inference

15. Ecological regression (ER) has been a commonly used statistical methodology for estimating racial block voting in voting rights cases in the past few decades, especially since the Supreme Court endorsed the use of it in the case leading to *Thornburg v. Gingles* (1986).[8] I have used ER in most of the more than forty Section 2 cases on which I have worked as a consultant.

16. Experts more recently—and those on both sides of the 2011 litigation on Texas redistricting—have used King's Ecological Inference method. As John Alford, an expert for the defendants expressed his preference: "Gary King's methods of ecological inference (referred to generally as EI) are normally preferred to previous methods based on various weighted and unweighted least squares."[9]

Selecting Contests to Examine in this Case

17. From the vast array of election contests it makes sense to narrow the selection for analysis to those in which minority voters will likely have a stake in the election, a horse in the race, so to speak. For the most part experts have chosen contests in which minority candidates

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8 Gary King, A Solution to the Ecological Inference Problem (Princeton: Princeton University Press, 1997), 38.

9 "Expert Report of Dr. John Alford," Perez, et al. v. State of Texas, Aug. 22, 2011: 11.

have run, as I have done in my previous report on analyses of election contests in 2012 and as done in this report on 2014 and 2016 elections.

18. To narrow the choice of races for the analyses in this report, MALDEF has focused on statewide offices involving Latino candidates.

19. For important methodological reasons, it is my opinion that general election contests are usually more probative for drawing conclusions about racially polarized voting than primary election contests and I focus in this report on general election contests. While some primary election contests are useful for testing the hypothesis that voting is racially or ethnically polarized within parties, ethnic group participation in party primaries is very skewed. For example, Secretary of State voting files for 2012 show 68 percent of voters in Nueces County Democratic primary with Spanish surnames, but the percent of voters with Spanish surnames in the Republican primary is only 13 percent. Hispanic voting in the Republican primary would not be typical of Hispanics in Nueces County; and Anglos voting in the Democratic primary would not typify Anglo voters in Nueces County.

20. In my opinion, Professor Richard Murray has expressed well the preference for general election contests in ascertaining racial bloc voting:

> Voting rights cases usually involve a good deal of scrutiny of the degree of racially polarized voting in relevant elections. In Texas this results in focusing primarily on the General Elections because, as we have noted, there are virtually no minority voters in the Republican Primaries, making racial/ethnic polarization impossible to measure in these contests. And in Democratic Primaries, the shrunken white vote is much more racially and ethnically tolerant of minority candidates than was the case in past decades simply because Anglos who have problems supporting black or Hispanic candidates either vote

in the GOP contests, or—more often—simply skip voting in March primaries. That leaves us with the General Elections as the key test of racial polarization, because these are the only partisan contests that reflect the racial and ethnic diversity of the state's population.[10]

Variables and Sources of Data

21. The data and analyses for this report were provided by the Mexican American Legal Defense and Education Fund (MALDEF). They are taken from chiefly three sources: (1) election returns provided by the counties to the Secretary of State; (2) Texas Secretary of State count of Spanish-surnamed and non-Spanish surnamed by precinct from the roster of actual voters provided to them by the counties[11]; and (3) special tabulation to the block-group level of the citizens of voting age by race and Hispanic origin for each precinct based on the contemporaneous American Community Survey.

Reliability of the Estimates

22. Because the voting estimates are derived from precinct-level data, there is error variance associated with each point estimate. King's Ecological Inference model estimates the confidence limits for each estimate.[12] In this case the 95% confidence limits are applied, which are most often used by social scientists. In other words, one can be confident that the actual vote for a candidate by an ethnic group will fall within confidence interval 95 out of 100 times.

23. When the confidence interval is very wide, one must be cautious about drawing conclusions from the point estimates. This is most likely to occur where there are very few precincts from which to draw estimates, where the range of ethnic composition of precincts is

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10 Richard Murray, "Congressional Plan C185," 19-20.

11 The Texas Secretary of State uses a list of Spanish-surnames developed by the Census Bureau to "flag" voters by Spanish-surname. On a history of the development of this list, see: http://www.census.gov/population/documentation/twpno13.pdf

12 King, A Solution to the Ecological Inference Problem, 149.

not very wide or when there are few voters of an ethnic group. The confidence intervals should

tell us whether the point estimates produced by the analysis differ from one another statistically

with 95 percent confidence. If the confidence intervals of two point estimates overlap, the

difference in the estimates would not be considered statistically significant.

III.   Findings

Congressional District 23: Latino v. non-Latino Voting

   24. In the 2012 general election Francisco "Quico" Canseco was a Republican incumbent

running against Pete Gallego, a Democrat. Gallego won with 50.3 percent to 45.6 percent for

Canseco. As many as 87 percent of Latino voters supported Gallego and 74 percent of non-

Latino voters supported Canseco. There was a high degree of polarized voting along ethnic

lines.

   25. In the 2014 general election, Republican Will Hurd challenged the incumbent Democrat,

Pete Gallego. Hurd won with 49.8 percent to 47.7 percent for Gallego. The contest was again

highly polarized along ethnic lines. Gallego received support from 88 percent of the Latino

voters and only 23 percent support non-Latino voters.

   26. In the 2016 general election, Hurd was challenged by Gallego again. Hurd won with 48.3

percent of the vote, compared to 47.0 percent for Gallego. The election was strongly polarized

along ethnic lines. Gallego was supported by 82 percent of Latino voters and only 14 percent of

non-Latino voters.

Table 1. Congressional District 23 Voting 2012-2016 King's Ecological Inference % of Voters Using SOS Indicator		
	Latino Voters	Non-Latino Voters
	2016 General Election	

Pete Gallego	82.0 (79.1-84.2)	14.0 (11.1-17.2)
	2014 General Election	
Pete Gallego	88.5 (86.6-90.4)	23.1 (20.6-26.0)
	2012 General Election	
Francisco "Quico" Canseco	10.1 (8.4-11.8)	73.8 (71.0-76.7)
	2012 General Election	
Pete Gallego	86.9 (85.2-88.6)	20.8 (18.2-23.6)

Nueces County: Latino v. non-Latino Voting

27. In my previous analyses of racial bloc voting in Nueces County I found that both national and county elections in 2012 were severely polarized between Latino and non-Latino voters. (See Table 2 below.) Using the same methods, I examined ten contests involving minority candidates in different offices: congressional, state representatives, state board of education and judicial contests in Nueces County. All were highly polarized along ethnic lines.

Table 2. Nueces County Voting in 2012 King's Ecological Inference % of Voters Using SOS Indicator		
	Latino Voters	Non-Latino Voters
2012 General Election		
US President		
Obama/Biden	90.9 (88.3 – 93.2)	15.7 (11.3– 20.8)
US Senator		
Cruz	10.6 (8.0 – 12.9)	79.2 (73.9 -- 83.4)
US Representative District 27		
Harrison	91.8 (89.3 – 94.5)	14.9 (10.1 – 20.1)
State Representative 34		
Herrero	95.6 (93.5 – 97.7)	11.1 (7.4 – 15.3)
State Board of Education, District 2		
Cortez	95.7 (93.0 – 98.1)	13.5 (9.2 – 19.2)
Justice, 13th Ct of Appeals, Place 2		

Longoria	97.0 (95.0 – 98.6)	19.6 (15.6 – 24.7)
	Justice, 13th Ct of Appeals, Place 4	
Rodriguez	97.4 (95.6 – 98.9)	23.3 (18.7 – 28.4)
	Justice 13th Ct of Appeals, Place 5	
Benavides	97.3 (95.2 – 98.9)	19.4 (14.9 -24.2)
	District Judge, 214th Judicial District	
J Longoria	96.9 (94.7 – 98.6)	22.3 (18.0 – 26.8)
	District Judge, 347th Judicial District	
Flores	90.1 (87.1 – 92.7)	9.6 (5.3 – 14.9)

28. This same pattern of polarization has continued in elections since then. The two statewide election contests with Latino candidates in 2016 and three such contests in 2014 were examined for racially polarized voting in Nueces County. Latino and non-Latino voters were strongly polarized in every contest. The two 2016 election contests analyzed were strongly polarized along racial and ethnic lines. (See Table 3.)

Table 3. Nueces County Voting in 2014-2016 King's Ecological Inference % Voters by Precinct using SOS Indicator		
	Latino Voters	Non-Latino Voters
	2016 General Election	
	Supreme Court, Place 5	
Dori Contreras Garza	91.8 (89.7-93.9)	14.3 (10.7-18.1)
	Supreme Court, Place 9	
Eva Guzman	12.6 (10.5-14.7)	80.4 (76.6-83.7)
	2014 General Election	
	Lt. Governor	
Leticia Van de Putte	89.1 (86.8-91.8)	18.9 (15.1-22.7)
	Land Commissioner	
George P. Bush	10.9 (7.8-13.5)	82.9 (78.9-86.9)
	Supreme Court, Place 7	
Gina Benavides	92.4	15.3

	(89.7-94.8)	(11.5-19.5_

29. In the case of Supreme Court Place 5, Democrat Dori Contreras Garza received 92 percent of the Latino votes, but only 14 percent of the non-Latino votes in Nueces County.

30. In Supreme Court Place 9, Republican Eva Guzman received support from 13 percent of the Latino votes and 80 percent of the non-Latinos in Nueces County.

31. The three election contests in 2014 were also strongly polarized along racial and ethnic lines.

32. In the race for Lt. Gov., Leticia Van de Putte was supported from 89 percent of Latinos and only 19 percent from non-Latino voters in Nueces County.

33. For Land Commissioner, George P. Bush was supported by 11 percent of Latino voters and 83 percent of non-Latino voters in Nueces County.

34. For Supreme Court Place 7, Gina Benavides received support from 92 percent of the Latino voters but only 15 percent of Anglo voters in Nueces County.

35. These findings are consistent with what I found in my analyses of the 2012 election.

South Texas Counties: Latino v. non-Latino Voting

36. The two statewide election contests with Latino candidates in 2016 and three such contests in 2014 were examined for racially polarized voting across 52 counties in South Texas.[13] Latino and non-Latino voters were strongly polarized in every contest. (See Table 4.)

37. In the case of Supreme Court Place 5, Democrat Dori Contreras Garza received 85 percent of the Latino votes, but only 15 percent of the non-Latino votes in South Texas.

38. In Supreme Court Place 9, Republican Eva Guzman received support from 12 percent of the Latino votes and 78 percent of the non-Latinos in South Texas.

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[13] The 52 counties are listed in Appendix B.

39. The three election contests in 2014 were also strongly polarized along racial and ethnic lines.

40. In the race for Lt. Gov., Leticia Van de Putte was supported from 82 percent of Latinos and only 18 percent from non-Latino voters in South Texas.

41. For Land Commissioner, George P. Bush was supported by 22 percent of Latino voters and 80 percent of non-Latino voters in South Texas.

42. For Supreme Court Place 7, Gina Benavides received support from 84 percent of the Latino voters but only 17 percent of Anglo voters in South Texas.

Table 4. Voting in 52 South Texas Counties: 2014-2016 King's Ecological Inference % of Voters Using SOS Indicator		
	Latino Voters	Non-Latino Voters
2016 General Election		
	Supreme Court, Place 5	
Dori Contreras Garza	84.5 (83.8-85.3)	15.4 (14.1-16.7)
	Supreme Court, Place 9	
Eva Guzman	21.7 (20.9-22.5)	78.5 (77.0-79.8)
2014 General Election		
	Lt. Governor	
Leticia Van de Putte	81.7 (80.6-82.5)	18.2 (17.3-19.4)
	Land Commissioner	
George P. Bush	21.9 (20.9-23.0)	80.2 (78.8-81.6)
	Supreme Court, Place 7	
Gina Benavides	83.6 (82.6-84.6)	16.7 (15.6-17.9)

Dallas County: Voting by Race and Ethnicity

43. The two statewide election contests with Latino candidates in 2016 and the three such contests in 2014 are analyzed as to how different racial/ethnic groups within Dallas County

voted in the election. The King EI analysis can break out the estimates of votes by each of the racial and ethnic groups. (See Table 5.)

	African American Voters	Latino Voters	Anglo (& other) Voters
Table 5. Dallas County Voting in 2014-16 King's Ecological Inference % of Voters Using SOS Indicator			
2016 General Election			
	Supreme Court, Place 5		
Dori Contreras Garza	92.9 (90.4-95.2)	87.2 (84.3-90.2)	32.6 (30.6-34.7)
	Supreme Court, Place 9		
Eva Guzman	4.3 (2.2-6.7)	16.4 (13.6-19.1)	64.0 (61.9-66.1)
2014 General Election			
	Lt. Governor		
Leticia Van de Putte	94.9 (92.6-96.9)	73.4 (69.5-77.1)	34.5 (32.2-36.9)
	Land Commissioner		
George P. Bush	2.5 (.5-4.9)	22.9 (19.2-27.0)	69.4 (66.8-71.9)
	Supreme Court, Place 7		
Gina Benavides	95.5 (93.1-97.5)	78.3 (74.5-82.1)	28.4 (26.1-31.0)

44. The two 2016 election contests analyzed were strongly polarized along racial and ethnic lines.

45. In the case of Supreme Court Place 5, Democrat Dori Contreras Garza received 93 percent of the African American votes, 87 percent of the Latino votes, but only 33 percent of the Anglo (plus other) votes in Dallas County.

46. In Supreme Court Place 9, Republican Eva Guzman received support from 4 percent of the African American voters, 16 percent of the Latino votes and 64 percent of the Anglo voters in Dallas County.

47. The three election contests in 2014 were also strongly polarized along racial and ethnic lines.

48. In the race for Lt. Gov., Leticia Van de Putte was supported by 95 percent of African Americans, 73 percent of Latinos and only 34 percent of Anglo voters in Dallas County.

49. For Land Commissioner, George P. Bush was supported by 3 percent of African American voters, 23 percent of Latino voters and 69 percent of Anglo voters in Dallas County. For Supreme Court Place 7, Gina Benavides received support from 95 percent of the African American voters, 78 percent of Latino voters, but only 28 percent of Anglo voters in Dallas County.

50. In all five of these contests, African American and Latino voters were supporting the same candidates and opposing the candidates preferred by Anglo voters. The degree of cohesiveness in voting between African Americans and Latinos was extremely high in Dallas County.

Tarrant County: Voting by Race and Ethnicity

51. The same analyses were conducted on Tarrant County voters in the 2014 and 2016 in statewide races where Latino candidates were on the ballot. The two 2016 election contests analyzed were strongly polarized along racial and ethnic lines. (See Table 6.)

	African American Voters	Latino Voters	Anglo (& other) Voters
Table 6. Tarrant County Voting in 2014-16 King's Ecological Inference % of Voters Using SOS Indicator			
2016 General Election			
Supreme Court, Place 5			
Dori Contreras Garza	92.4 (82.5-99.6)	88.1 (83.1-93.0)	21.9 (19.8-24.1)
Supreme Court, Place 9			
Eva Guzman	6.0	12.0	72.9

	(.1-15.1)	(7.2-17.1)	(70.7-74.7)
2014 General Election			
Lt. Governor			
Leticia Van de Putte	92.0 (81.9-99.7)	78.6 (72.8-84.2)	23.4 (21.2-26.2)
Land Commissioner			
George P. Bush	6.2 (.1-16.4)	17.6 (11.2-23.3)	76.4 (74.3-78.6)
Supreme Court, Place 7			
Gina Benavides	92.7 (82.0-99.7)	81.2 (75.0-87.3)	21.2 (18.9-23.8)

52. In the case of Supreme Court Place 5, Democrat Dori Contreras Garza received 92 percent of the African American votes, 88 percent of the Latino votes, but only 22 percent of the Anglo (plus other) votes in Tarrant County.

53. In Supreme Court Place 9, Republican Eva Guzman received support from 6 percent of the African American voters, 12 percent of the Latino votes and 73 percent of the Anglo voters in Tarrant County.

54. The three election contests in 2014 were also strongly polarized along racial and ethnic lines.

55. In the race for Lt. Gov., Leticia Van de Putte was supported by 92 percent of African Americans, 79 percent of Latinos and only 23 percent of Anglo voters in Tarrant County. For Land Commissioner, George P. Bush was supported by 6 percent of African American voters, 18 percent of Latino voters and 76 percent of Anglo voters in Tarrant County.

56. For Supreme Court Place 7, Gina Benavides received support from 93 percent of the African American voters, 81 percent of Latino voters, but only 21 percent of Anglo voters in Tarrant County.

57. In all five of these contests, African American and Latino voters were supporting the same candidates and opposing the candidates preferred by Anglo voters. The degree of

cohesiveness in voting between African Americans and Latinos was extremely high in Tarrant

County.

Harris County: Voting by Race and Ethnicity

58. The same analyses were conducted on Harris County voters in the 2014 and 2016 in

statewide races where Latino candidates were on the ballot. (See Table 7.)

Table 7. Harris County Voting in 2014-16 King's Ecological Inference % of Voters Using SOS Indicator			
	African American Voters	Latino Voters	Anglo (& other) Voters
2016 General Election			
	Supreme Court, Place 5		
Dori Contreras Garza	92.7 (87.2-97.6)	79.8 (77.4-82.1)	25.9 (23.4-28.4)
	Supreme Court, Place 9		
Eva Guzman	4.5 (.1-10.1)	22.8 (20.7-25.2)	72.0 (69.7-74.3)
2014 General Election			
	Lt. Governor		
Leticia Van de Putte	94.9 (89.3-99.2)	64.5 (61.6-67.2)	27.1 (24.6-30.0)
	Land Commissioner		
George P. Bush	3.2 (.1-9.1)	32.3 (29.3-35.0)	76.9 (74.3-79.3)
	Supreme Court, Place 7		
Gina Benavides	95.3 (89.7-99.3)	68.0 (64.8-71.1)	22.9 (20.4-25.8)

59. In the case of Supreme Court Place 5, Democrat Dori Contreras Garza received 93

percent of the African American votes, 80 percent of the Latino votes, but only 26 percent of the

Anglo (plus other) votes in Harris County.

60. In Supreme Court Place 9, Republican Eva Guzman received support from 4 percent of

the African American voters, 23 percent of the Latino votes and 72 percent of the Anglo voters

in Harris County.

61. The three election contests in 2014 were also strongly polarized along racial and ethnic lines.

62. In the race for Lt. Gov., Leticia Van de Putte was supported by 95 percent of African Americans, 65 percent of Latinos and only 27 percent of Anglo voters in Harris County.

63. For Land Commissioner, George P. Bush was supported by 3 percent of African American voters, 32 percent of Latino voters and 77 percent of Anglo voters in Harris County. For Supreme Court Place 7, Gina Benavides received support from 95 percent of the African American voters, 68 percent of Latino voters, but only 23 percent of Anglo voters in Harris County.

64. In all five of these contests, African American and Latino voters were supporting the same candidates and opposing the candidates preferred by Anglo voters. The degree of cohesiveness in voting between African Americans and Latinos was extremely high in Harris County.

Bexar County: Voting by Race and Ethnicity

65. The same analyses were conducted on Bexar County voters in the 2014 and 2016 in statewide races where Latino candidates were on the ballot. (See Table 8.)

	African American Voters	Latino Voters	Anglo (& other) Voters
Table 8. Bexar County Voting in 2014-16 King's Ecological Inference % of Voters Using SOS Indicator			
2016 General Election			
Supreme Court, Place 5			
Dori Contreras Garza	78.7 (62.4-92.0)	80.6 (78.6-82.7)	19.3 (16.3-22.2)
Supreme Court, Place 9			
Eva Guzman	16.0 (0.9-34.7)	19.9 (17.4-22.2)	76.1 (72.7-79.3)
2014 General Election			
Lt. Governor			

Leticia Van de Putte	69.0	81.6	23.4
	(47.3-84.0)	(79.3-84.0)	(19.8-27.2)
	Land Commissioner		
George P. Bush	24.9	20.7	82.8
	(7.6-45.4)	(18.3-22.9)	(78.7-86.7)
	Supreme Court, Place 7		
Gina Benavides	73.7	81.6	16.7
	(59.3-86.5)	(79.6-83.7)	(13.1-20.4)

66. In the case of Supreme Court Place 5, Democrat Dori Contreras Garza received 79

percent of the African American votes, 81 percent of the Latino votes, but only 19 percent of the

Anglo (plus other) votes in Bexar County.

67. In Supreme Court Place 9, Republican Eva Guzman received support from 16 percent of

the African American voters, 20 percent of the Latino votes and 776 percent of the Anglo voters

in Bexar County.

68. The three election contests in 2014 were also strongly polarized along racial and ethnic

lines.

69. In the race for Lt. Gov., Leticia Van de Putte was supported by 69 percent of African

Americans, 82 percent of Latinos and only 23 percent of Anglo voters in Bexar County.

For Land Commissioner, George P. Bush was supported by 25 percent of African American

voters, 21 percent of Latino voters and 83 percent of Anglo voters in Bexar County.

70. For Supreme Court Place 7, Gina Benavides received support from 74 percent of the

African American voters, 82 percent of Latino voters, but only 17 percent of Anglo voters in

Bexar County.

71. In all five of these contests, African American and Latino voters were supporting the

same candidates and opposing the candidates preferred by Anglo voters. The degree of

cohesiveness in voting between African Americans and Latinos was extremely high in Bexar County.

IV.   Conclusions

72. In this report, I have updated my analyses from my earlier report on "Racial Bloc Voting in Seven Texas Counties in 2012"[14] to statewide general election contests in 2014 and 2016 involving Latino candidates in Bexar, Dallas, Harris, Nueces, Tarrant and a combined area of 52 counties of South Texas. The model used to analyze voting patterns by racial and ethnic group in these counties is Ecological Inference, the same method I used for my earlier analyses. I conclude that:

- Latino voters are voting as a cohesive group in each of the areas studied, usually with more than 80 percent supporting the Democratic candidates.

- African American voters examined in the analyses of Dallas, Tarrant, and Harris Counties were found to be very cohesive with more than 90 percent supporting the Democratic candidates.

- Black voters were also found to be cohesive in Bexar County with more than 70 percent supporting Latino Democratic candidates.

- African American and Latino voters are found to be supporting the same candidates in all the areas studied. There is clearly a pattern of coalition voting between these two groups.

- Non-Hispanic white voters (Anglos) are found to be a cohesive bloc, with more than 70 percent supporting Republican candidates in all of the areas studied.

- Racially polarized voting is found in each area studied. The differences between Anglo voters and minority voters are statistically significant and substantively large.

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14 "Declaration of Dr. Robert R. Brischetto: Racial Bloc Voting in Seven Texas Counties in 2012," MALC Exhibit 161, July 14, 2014.

DATED: May 26, 2017   Respectfully Submitted,

                                       /s/ Robert R. Brischetto
                                       Robert R. Brischetto